

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP, D/B/A VERIZON
WIRELESS AND VERIZON CORPORATE
SERVICES GROUP INC.,

Defendants.

Case No. 2:23-cv-00352-JRG-RSP

JURY TRIAL DEMANDED

JOINT MOTION TO AMEND FIRST AMENDED DOCKET CONTROL ORDER

Plaintiff Headwater Research, LLC (“Headwater”) and Defendants Cellco Partnership, d/b/a Verizon Wireless and Verizon Corporate Services Group Inc. (collectively, “Verizon” or “Defendants”), (collectively, the “Parties”) respectfully file this Joint Motion to Amend the First Amended Docket Control Order (Dkt. No. 119) and would show the Court as follows:

The current deadline for the Parties to Serve Disclosures for Expert Witnesses by the Party with the Burden of Proof is January 15, 2025, and the current deadline for the Parties to Serve Disclosures for Rebuttal Expert Witnesses is February 10, 2025. At this time, the Parties request a brief extension of the deadline to Serve Disclosures for Expert Witnesses by the Party with the Burden of Proof to **January 20, 2025** (from January 15, 2025) and a brief extension of the deadline to Serve Disclosures for Rebuttal Expert Witnesses to **February 14, 2025** (from February 10, 2025). These brief extensions of less than one week will allow the Parties additional time to complete fact discovery before the expert disclosures and to incorporate that fact discovery into such expert disclosures.

The Parties represent that this Motion is not filed for the purposes of delay but rather so that justice may be served. The Parties have met and conferred and are jointly seeking the relief sought in this Motion.

Accordingly, the Parties respectfully request that the Court grant this Joint Motion to Amend the First Amended Docket Control Order (Dkt. No. 119) as follows:

| ORIGINAL DATE | AMENDED DATE | EVENT |
|-------------------|--------------------------|--|
| February 10, 2025 | February 14, 2025 | Serve Disclosures for Rebuttal Expert Witnesses |
| January 15, 2025 | January 20, 2025 | Serve Disclosures for Expert Witnesses by the Party with the Burden of Proof |

Dated: December 27, 2024

/s/ Katherine Q. Dominguez

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**ATTORNEYS FOR PLAINTIFF,
Headwater Research LLC**

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 27th day of December 2024, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster

Marc Fenster

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

s/ Marc Fenster
Marc Fenster